

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 1-17 are pending in this application. Claims 1, 13, 16, and 17 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 13.

**Drawings**

The Applicant respectfully requests the Examiner to indicate whether the originally filed drawings are acceptable.

**Request for Examiner Interview**

Applicant respectfully requests an Examiner Interview to discuss the referenced application at a date and time convenient for all parties. An Applicant Initiated Interview Request Form is attached to this response.

**Claim Amendments**

Independent claims 1, 13, 16, and 17 have been amended to clarify that “the application accesses data from a database associated with the at least one artifact using a read/write consistency specification *when the application enters the at least one of the plurality of the states.*” Support for the aforementioned amendment may be found, for example, in paragraphs [0030] and [0031] in the specification. Independent claims 1, 13, 16, and 17 have also been amended to clarify that the read/write consistency specification *applies to* the at least one

ratification. Support for the aforementioned amendment may be found, for example, in Code Samples 1-7 in the specification. Further, claim 13 has been amended to address the antecedent basis issue noted by the Examiner. Finally, claim 8 has been amended to correct a typographical error noted by the Examiner. No new matter has been added by any of the aforementioned amendments.

**Claim Objection(s)**

Claim 8 was objected to as including an informality noted by the Examiner. The Applicant has amended claim 8 to address the informality noted by the Examiner. Accordingly, withdrawal of the objection is respectfully requested.

**Rejection(s) under 35 U.S.C. §112**

Claim 13 was rejected under 35 U.S.C. §112, ¶2, for lacking antecedent basis for the element “database schema.” Claim 13 has been amended to correct provide sufficient antecedent basis for the element “database schema.” Accordingly, withdrawal of the rejection is respectfully requested.

**Rejection(s) under 35 U.S.C. §102**

Claims 1-17 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No.5,615,362 (“Jensen”). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

In order for Jensen to anticipate the amended claims, Jensen must teach every aspect to the pending claims, either explicitly or impliedly. The Applicant respectfully asserts that Jensen

fails to teach or suggest all the limitations of the amended claims. Specifically, Jensen fails to teach at least the following limitations of amended independent claim 1:

- (i) “an application comprising a transaction, wherein the transaction comprises at least one of a plurality of states, at least one of a plurality of transitions, and at least one artifact” – This limitation requires that *the application* includes a transaction, where the transaction includes a state, a transition, and an artifact. Further, the state corresponds to the state of the application. Said another way, the application at any given time is in a particular state (*see* (iii) below).

Turning to the rejection, the Examiner has asserted that transaction recited in the claim corresponds to an object instance (*see* Office Action mailed January 26, 2006, p. 3). The Applicant respectfully disagrees. Specifically, Jensen defines an object instance as follows:

“An “object instance” is an embodiment (instantiation) of an object class. Instances are differentiated from one another by their attribute values, but not their routines (capabilities). For example, Jane Smith may be a first person-object instance and John Doe may be a second person-object instance.” (Jensen, col. 5, ll. 50-57)

From the above definition, the object instance is not equivalent to a transaction. Further, it would be improper for the Examiner to read the term “object instance” any broader than the specific (and unambiguous) definition provided within the cited prior art. Specifically, an object instance corresponds to a runtime instance of a class, which is composed of attributes. In contrast, the transaction, as recited in the claim, includes states and transitions, where the states are associated with the application. There is no mention that the object instance, as defined in Jensen, includes or contemplates a state or a transition, where the state is associated with an application. Again, any attempt by the Examiner to read the term clearly defined in Jensen more broadly is improper.

The Examiner has also asserted that the term “state” as recited in the claims is equivalent to the term “state” that appears in Jensen (*see* Office Action mailed January 26, 2006, p. 3). The Applicant respectfully disagrees. In particular, the term “state” used in Jensen corresponds to the state of a given piece of data (*see* Jensen, col. 9, ll. 20-26). In contrast, the term “state” as recited in the claims (*see* (iii) below) corresponds to the state of the application. Thus, the term “state” used in Jensen is clearly not equivalent to the term “state” recited in the claims.

- (ii) “wherein the read/write consistency specification specifies at least one of a read consistency and a write consistency to apply to the at least one artifact” – This limitation of the claim requires that the presence of a data structure (or file) that specifies one of the read consistency and the write consistency to apply to the artifact (*see e.g.*, Specification, Code Samples 1-7). Turning to rejection, the Examiner has asserted that the following portion of Jensen teaches the this limitation (*see* Office Action mailed January 26, 2006, pp. 3-4):

Second, it ensures that only one copy of an object instance is in the cache at any given time, even if several different queries return the same information from the database. Third, the mechanism guarantees the integrity of data in the cache by locking data appropriately in the structured database during a database transaction, flushing cache data at the end of each transaction, and transparently re-reading the data and reacquiring the appropriate locks for an object instance whose data has been flushed. (Jensen, col. 4, ll. 41-49)

A review of the portion of Jensen cited by the Examiner reveals no disclosure of a read/write consistency specification (or any other data structure) that specifies one of the read consistency and the write consistency to apply to the artifact. In fact, the portion of Jensen cited by the Examiner is directed to ensuring that the integrity of data in the cache without any disclosure of a specification that specifies one of the read consistency and the write consistency to apply to the artifact, where the artifact is used by the application; and

(iii) “wherein the application accesses data from the database associated with the at least one artifact using a read/write consistency specification when the application enters the at least one of the plurality of the states” – This limitation requires that the application access data associated with the artifact in accordance with the read/write consistency specification when the application enters a particular state. Turning to the rejection, as discussed above, Jensen fails to disclose a state, where the state corresponds to a state within the application. Further, as discussed above, Jensen fails to disclose a read/write consistency specification. In view of Jensen’s failure to disclose a state (as recited in the claims) and a read/write consistency specification, it logically follows that Jensen also does not disclose using the read/write consistency specification when entering a particular state within an application.

In view of the above, the Jensen fails to teach or suggest all the limitations of amended independent claim 1. Thus, amended independent claim 1 is patentable over Jensen. Amended independent claims 13, 16, and 17 include at least the same patentable limitations as amended independent claim 1. Thus, amended independent claims 13, 16, and 17 are patentable over Jensen for at least the same reasons as amended independent claim 1. Further, any dependent claims, whether directly or indirectly dependent from the amended independent claims, are patentable over Jensen for at least the same reasons as the aforementioned independent claims.

In addition to the above, amended independent claims 13, 16, and 17, are further patentable over Jensen for at least the following additional reason. Specifically, amended independent claims 13, 16, and 17 include the following limitation: “generating the application using a database schema, the application usage specification, and the read/write consistency

specification.” The Examiner has asserted that the following portion of Jensen teaches this limitation (*see* Office Action mailed January 26, 2006, p. 6):

This mechanism uses an object model, database schema, and transform to define a mapping between the structured database and object instances of the application. Given these three inputs, it is possible to construct an object-oriented application that can retrieve information from the structured database according to the semantics of the object model. In particular, the application can retrieve a single object instance (that is, retrieve database information corresponding to a single object instance) using an object ID value, and can retrieve object instances related to a given object instance by following the relationship semantics of the object model and using foreign key mappings as specified by the transform. (Jensen, col. 10, ll. 46-57)

A review of the portion of Jensen cited by the Examiner reveals that there is no disclosure of using a database schema, an application usage specification, and a read/write consistency specification to generate an application. More specifically, neither the object model nor the transformation corresponds to the read/write consistency specification. The claim recites that the read/write consistency specification “includes at least one of a read consistency and a write consistency to apply to the at least one artifact.” In contrast, Jensen defines an object model as follows:

An "object model" is a set of object classes that together form a blueprint for building an object-oriented application. Each object class of an object model can have attributes, inheritances, and relationships. (Jensen, col. 5, l. 66 - col. 6, l. 2)

From the above, it is clear that an object model does correspond to the read/write consistency specification. Further, the “transform to define a mapping between the structured database and object instances of the application” (Jensen, col. 10, ll. 47-48) is also not equivalent to the read/write consistency specification, because the read/write consistency specification defines at least one of a read consistency and a write consistency to apply to the artifact. No such teaching is found in the cited prior art.


In view of the above, the Jensen fails to teach or suggest this additional limitation of amended independent claims 13, 16, and 17. Thus, amended independent claims 13, 16, and 17 are patentable over Jensen for this additional reason. Any dependent claims, whether directly or indirectly dependent from the amended independent claims, are patentable for at least the same reasons as the aforementioned independent claims. Withdrawal of this rejection is respectfully requested.

### Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226/305001; P9163).

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Respectfully submitted,

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Attachment (Applicant Initiated Request Form)